



DEPARTMENT OF THE ARMY  
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS  
P.O. BOX 1715  
BALTIMORE, MD 21203-1715

REPLY TO  
ATTENTION OF

CENAB-EN-H (200-1c)

22 September 1998

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, Buffalo District, ATTN:  
Mr. Ray Pilon, 1776 Niagara Street, Buffalo, New York 14207-3199

SUBJECT: Resume' of Staff Visit to Lake Ontario Ordnance Works Asbestos Abatement

1. Enclosed is a Resume' of Staff Visit prepared by Mr. Vernon Griffin as the result of his quality assurance visit to the subject project on 9 and 10 September 1998.
2. This Resume' of Staff Visit contains observations made in the field and recommendations for your consideration in improving site activities presently employed by the contractor. You will note that a constant theme is concern of potential cross-contamination. It is recommended that your Construction Division be made aware of this concern and that they institute field procedures to minimize the potential for cross-contamination.
3. Please be assured that any future visits to project sites will be coordinated in advance with the Project Manager and appropriate Construction Division personnel on-site.
4. Questions concerning the Resume' of Staff may be directed to my point of contact, Mr. Vernon Griffin at 41 O-962-3333.

Encl

A handwritten signature in cursive script, reading "Clinton L. Anuszevski".

CLINTON L. ANUSZEWSKI, P.E.  
Acting Chief, HTRW Branch  
Engineering Division


21 September 1998

MEMORANDUM FOR Chief, Civil HTRW Section, ATTN: Justina Wesley

SUBJECT: Site Activity Observation, Lake Ontario Ordnance Work Asbestos Abatement, Lewiston and Porter, Niagara County, New York

1. Reference verbal request for site activity observation for referenced project.
2. The Industrial Hygiene and Chemistry Section has performed the field support and submits the enclosed Resume of Staff Visit.
3. The Industrial Hygiene and Chemistry Section point of contact for this project is Vernon W. Griffin at X3333.

Encl.

  
PETER GARGER  
Chief, Industrial Hygiene  
and Chemistry Section

RESUME OF STAFF VISIT

STAFF OFFICIAL: Vernon W. Griffin, CENAB-EN-HI, (410) 962-3333

PROJECT VISITED: Lake Ontario Ordnance Work, Niagara County, Lewiston, New York

DATE OF VISIT: 09-10 September 98

PRINCIPAL CONTACTS: Justina Wesley, USACE, Baltimore District (410) 962-6714; Kevin Cannon, Environmental Products and Services

PURPOSE OF VISIT: To provide quality assurance overview of asbestos abatement project.

FINDINGS:

Contractors from Environmental Products and Services were observed to be pressure washing the second floor of building 6-01 while other employees glove bagged asbestos containing material (ACM) that existed around piping. ACM, friable and non-friable, was present throughout the building, on the floor, piping and some equipment. It was noticed that some employees were wearing facial hair that would interfere with the donning of the respirator.

Building 6-01 is not enclosed allowing wind to blow through disturbing the friable asbestos.

Water used for pressure washing building 6-01 is not being collected or filtered. Water is draining from the building and onto the ground, saturating the soil and migrating down hill outside the identified 10 foot soil removal area. This water contains asbestos particles.

Equipment from the building is not moved to first floor for wiping and/or washing. Equipment washed in place. No laydown area has been established.

Bags of asbestos containing mortar not placed in drums during pressure washing of second floor. Mortar is covered with polyethylene and stored on first floor.

CENAB-EN-HI (200-I c)

SUBJECT: SUBJECT: Site Activity Observation, Lake Ontario Ordnance Work  
Asbestos Abatement, Lewiston and Porter, Niagara County, New York

Metal shelving, beams, and other miscellaneous, metal that were located in building 6-01 and marked to be kept by the Somerset Group, haphazardly thrown into big piles on the ground outside of building 6-01 without being covered or cleaned.

Dust control measures were not in place. Soil containing visible, friable ACM, (i.e. crushed transit panels) observed blowing around the site. No perimeter air monitoring being performed. Air monitoring is being conducted on personnel and in the courtyard.

Decontamination area for equipment being used in areas where contact with friable ACM has not been established.

Equipment not maintained in one certain area or cleaned before being moved around the site and through areas that were not identified for soil removal. Equipment, (i.e. fork lifts), used inside building 6-01 observed to be tracking ACM from inside the building to areas 150 feet west of the building to the roll-off locations disposing of collected transite panels. This same equipment also noticed to be tracking ACM to other locations around the outside perimeter of building 6-01 that had not been identified for soil removal. Track hoe observed going from an area with visible ACM in the soil through areas not identified for soil removal without being cleaned. Track hoe observed moving from these areas and down a paved road-leaving dirt containing ACM without cleaning it up or wetting the road.

Several areas throughout the site with suspect ACM, (i.e. jackets), along with asbestos containing transite panels and other debris that, per contractor, were not identified as areas that need to be evaluated or cleaned up. The contractor stated that they bid and were awarded the contract on the 90% design, which did not address some of these areas.

Care should be taken to prevent unnecessary exposure to employees and the environment from asbestos fibers that could become airborne during abatement procedures. Inspection of employees should be done at the beginning of each workday to ensure that they are free of hair that will interfere with the donning of the respirator.

CENAB-EN-HI (200-I c)

SUBJECT: SUBJECT: Site Activity Observation, Lake Ontario Ordnance Work  
Asbestos Abatement, Lewiston and Porter, Niagara County, New York

#### COMMENTS/RECOMMENDATIONS:

All contaminated wash water is required to be collected and filtered through a **HEPA** filter prior to discharge to the sewer or to grade. This can be accomplished by creating a **bermed** area with polyethylene to collect the water before discharge.

All items and equipment stored in building 6-01 is required to be removed and decontaminated prior to the start of asbestos abatement. This equipment should be placed in the **laydown** area that should be located on the first floor of building 6-01. The **laydown** area is required to have at a minimum, three layers of 6-mil polyethylene within a berm. This equipment is required to be labeled or tagged and transported to a temporary storage area. This storage area is required to be located at least 100 ft from and soil removal areas and is required to be free of asbestos. Removed items are required to be **tarped**.

Bags of mortar should be placed in drums for containment. This is necessary to protect the mortar from being spread further by the wind. Preventing the spread of contamination.

Soil containing ACM and other items containing ACM will require controlled wetting down to minimize potential admissions. The soil should also be wetted down or completely covered while waiting for transport to the landfill.

Decontamination pads should be constructed to clean heavy equipment prior to it leaving contaminated areas for or through "clean" areas. These pads should be constructed in an area where the least possible contact with contamination will occur. This is to prevent the spread of contamination to areas not designated for soil removal.

Roads should be wetted down and/or cleaned free of any contaminated dirt after being used. This is to prevent the spread of contamination and the control of potential admissions.

CENAB-EN-HI (200-I c)

SUBJECT: SUBJECT: Site Activity Observation, Lake Ontario Ordnance Work  
Asbestos Abatement, Lewiston and Porter, Niagara County, New York

Roll-off containers should be placed closer to the actual work area so that the equipment will not have to go through areas that are not designated for soil removal when disposing of transit panels and other contaminated debris.

If there are any questions concerning this Resume of Staff Visit, please contact the undersigned at (410) 962-3333.

A handwritten signature in black ink, appearing to read 'Vernon W. Griffin', with a stylized flourish at the end.

VERNON W. GRIFFIN  
Environmental Health Technician